

Attorneys for Plaintiff
ROSARIO ALONSO

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Attorneys for Defendant
WALGREEN CO.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ROSARIO ALONSO, an individual,) Case No. 5:12-CV-06269-HRL
)
)
Plaintiff,)
)
)
v.)
) **STIPULATION CONTINUATION**
) **DESIGNATION DATE; [P]**
WALGREEN CO., and DOES 1 – 50,) **ORDER**
inclusive,)
)
)
Defendants.)

**STIPULATION CONTINUING EXPERT
DESIGNATION DATE; ~~[PROPOSED]~~
ORDER**

Plaintiff Rosario Alonzo (“Plaintiff”) and Defendants Walgreen Co. (“Defendant”), through their respective counsel of record, stipulate and agree as follows:

The parties have engaged in significant written and deposition discovery. However, in light of availability and location, the parties have agreed on deposition dates for indispensable witnesses to occur after the discovery cut-off date. The indispensable witnesses to be deposed

1 are Walgreen's person most knowledgeable and human resource person, which were taken in
2 Chicago, Illinois on September 25, 2013 and September 26, 2013, respectively. During the
3 depositions, additional documents were produced that could be relevant to expert testimony. In
4 addition, the transcripts for the Chicago depositions have not been finalized yet.

5 WHEREAS the testimony sought at deposition of Walgreen's person most
6 knowledgeable and human resource person is important for the purpose of any retained expert's
7 opinion as to the facts and circumstances involved in this matter, and is therefore significant for
8 any expert's reports or findings that may either be relied upon by the parties or assist the finder
9 of fact.

10 WHEREAS, the original date for designation of expert witnesses with reports was
11 August 6, 2013.

12 WHEREAS, the parties jointly stipulated on September 27, 2013 to extend designation
13 of experts with reports from September 23, 2013 to October 4, 2013; rebuttal experts with
14 reports deadline extended from October 21, 2013 to November 4, 2013; expert discovery cut-off
15 date extended from November 4, 2013 to November 22, 2013.

16 WHEREAS, per the Court's Local Rules, counsel for the parties have met and conferred
17 on scheduling dates and location of remaining depositions and extending the date for each side
18 to designate experts with reports.

19 WHEREAS, the parties jointly agree to extend the date for designation of expert
20 witnesses with reports to October 11, 2013;

21 NOW THEREFORE, The undersigned parties submit this stipulated request and
22 respectfully request that the Court issue an Order as follows:

23 In order to accommodate the parties in providing information for possible expert
24 witnesses and their preparation of reports, the parties respectfully request an extension of the
25 deadline to designate experts with reports, and the Court include in its Order the following:

26 The designation of experts with reports will be extended from October 4, 2013 to
27 October 11, 2013 or any such later dates as the Court see fit;

28 The designation of rebuttal experts with reports deadline will be extended from ~~October~~ ^{November}
4, 2013 to November 11, 2013, or any such later dates.

1 The expert discovery cut-off date will be extended from November 22, 2013 to
2 November 29, 2013, or any such later dates.

3
4 IT IS SO STIPULATED:

5
6 Date: October 8, 2013

EQUALITY LAWYERS

7
8 /s/ Larry A. Organ

LARRY ORGAN

9 BARBARA FIGARI

10 ROBERT FORDIANI

11 Attorney for Plaintiff

12
13 Date: October 8, 2013

BERRY & BLOCK, LLP

14
15 /s/ Rex Darrell Berry

16 REX DARRELL BERRY

17 Attorney for Defendant

18 IT IS SO ORDERED

19 Date: October 28, 2013

20
21 
22 _____
23 HOWARD R. LOYD

24 UNITED STATES MAGISTRATE
25 JUDGE
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